

REMARKS

I. INTRODUCTION

In the Final Office Action (mailed July 11, 2003), the Examiner sustained the claim rejections of the previous Office Action (mailed November 1, 2002). In the previous Office Action, the Examiner rejected claims 21-35 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,150,193 to Thomas P. Glenn (hereafter referred to as "*Glenn*"). Claim 21 has been amended so that the term "conductor" is now consistently used throughout the claim. Claims 26 and 35 have been amended to correct an antecedent basis error and to more clearly recite the subject matter therein. No new matter has been added. Reconsideration of the present application in view of the following remarks is respectfully requested.

II. THE 35 U.S.C. § 102(e) REJECTIONS SHOULD BE WITHDRAWN

Claims 21-35 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Glenn. Applicants respectfully submit that Glenn does not anticipate any of claims 21-35 for at least the following reasons.

In order for a reference to anticipate a claim, "every element of the claimed invention must be identically shown in a single reference." In re Bond, 910 F. 2d 831, 832, 15 USPQ 2d 1566, 1567 (Fed Cir. 1990) (emphasis added).

Applicants respectfully submit that Glenn does not show every element of claim 21 because Glenn does not describe "a plurality of conductors . . . wherein at least one conductor comprises at least three wires, the at least one conductor being a continuous conducting segment deposited in a single direction relative to the boundaries of the integrated circuit;" and "wherein, for each conductor that comprises at least three wires, at least 30 percent of the at least three wires are deposited in different directions." as recited in amended claim 21. Glenn

describes a method for shielding an integrated circuit (IC) chip package. As described in Glenn's Abstract, the method entails mounting an integrated chip to a substrate surface and then encapsulating the chip and substrate within an insulating encapsulant layer. According to Glenn, shielding prevents IC chip package radiation from interfering with adjacent electronic components. Conversely, shielding also prevents electronic component radiation from interfering with adjacent IC chip packages. Col. 1, lines 25-30. The Examiner suggests that the conductors 26 illustrated in Figures 7C and 8C of Glenn describe the plurality of conductors recited in claim 21. However, nothing in Glenn describes any of the conductors 26 as being composed of at least three wires such that the conductor 26 is a continuous conducting segment deposited in a single effective direction relative to the boundaries of the integrated circuit. In addition, Glenn fails to describe an embodiment wherein a conductor 26 is composed of at least three wires and wherein at least 30 percent of the at least three wires of that conductor 26 are deposited in different directions.

In light of the foregoing, it is respectfully submitted that Glenn does not identically show every element recited in claim 21. Therefore, Glenn does not anticipate the subject matter of claim 21. Applicants respectfully request withdrawal of the rejection of claim 21 under 35 U.S.C. § 102(e) as anticipated by Glenn.

Each of claims 22-25 are dependent, either directly or indirectly, upon independent claim 21. Therefore, claims 22-25 are patentable over Glenn for the same reasons that independent claim 21 is patentable over Glenn.

Applicants respectfully submit that Glenn does not describe every element of claim 26 because Glenn does not describe an integrated circuit having "at least two pairs of conductors" wherein each pair of conductors comprises "a first wire deposited in a Manhattan

direction relative to the boundaries of the integrated circuit,” and “a second wire deposited in a diagonal direction relative to the boundaries of the integrated circuit,” as recited in claim 26. Additionally, Glenn fails to describe “at least two pairs of conductors . . . wherein, an effective direction of the pairs of conductors comprises an angle, A, measured relative to the boundaries of the integrated circuit, the angle A being defined by the expression $\tan A=Y/X$,” as recited in amended claim 26. As mentioned above, Glenn describes a method for shielding an IC chip package. The Examiner suggests that the conductors 26 illustrated in Figures 7C and 8C of Glenn describe the conductors recited in claim 26. However, nothing in Glenn describes the conductors 26 as being composed of wires which are deposited in both Manhattan and diagonal directions. In addition, neither Figure 7C nor Figure 8C of Glenn show pairs of conductors 26 which have an effective direction which can be defined by the expression $\tan A=Y/X$. Because Glenn does not describe the conductors 26 as having wires deposited in both Manhattan and diagonal directions; and because Glenn does not show pairs of conductors with an effective direction which can be defined by the expression $\tan A=Y/X$, Glenn does not identically show every element recited in claim 26.

In light of the foregoing, it is respectfully submitted that Glenn does not anticipate the subject matter of claim 26. Applicants respectfully request withdrawal of the rejection of claim 26 under 35 U.S.C. § 102(e) as anticipated by Glenn.

Each of claims 27-34 is dependent, either directly or indirectly, upon independent claim 26. Therefore, claims 27-34 are patentable over Glenn for the same reasons that independent claim 26 is patentable over Glenn.

Applicants respectfully submit that Glenn does not identically show every step of claim 35. Claim 35 recites a method for simulating a wiring direction by coupling wires

deposited in Manhattan and diagonal directions. Similar to the “first wire” and “second wire” elements discussed above with respect to claim 26, method claim 35 recites steps of “depositing a first wire in a Manhattan direction relative to the boundaries of the integrated circuit,” and “depositing a second wire in a diagonal direction relative to the boundaries of the integrated circuit.”. As mentioned above, nothing in Glenn describes the conductors 26 as comprising wires which are deposited in both Manhattan and diagonal directions. Therefore, for the same reasons discussed above with respect to claim 26, Glenn fails to identically show every step recited in claim 35.

In light of the foregoing, it is respectfully submitted that Glenn does not anticipate the subject matter of claim 35. Applicants respectfully request withdrawal of the rejection of claim 35 under 35 U.S.C. § 102(e) as anticipated by Glenn.

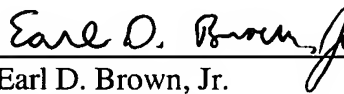
CONCLUSION

In view of the foregoing, it is submitted that the claims are in condition for allowance. Reconsideration of the rejections and objections is requested. Allowance is earnestly solicited at the earliest possible date.

Respectfully submitted,

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Dated: 1-12-04



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